



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

June 23, 2008

Reply to
Attn. of: ETPA-088

Ref: 97-013-BLM

Mr. Thomas P. Lonnie, State Director
Bureau of Land Management
Alaska State Office
222 West Seventh Avenue, #13
Anchorage, Alaska 99513-7504

Dear Mr. Lonnie:

The EPA has reviewed the **Northeast National Petroleum Reserve-Alaska (NE NPR-A) Final Supplemental Integrated Activity Plan/ Environmental Impact Statement (IAP/EIS)** (CEQ No. 20080199) according to our responsibilities and authorities under Section 309 of the Clean Air Act (CAA) and the National Environmental Policy Act (NEPA).

The final IAP/EIS considers four alternatives, which analyze making available for lease lands that are currently unavailable under the 1998 NE NPR-A Record of Decision (ROD). The Bureau of Land Management (BLM) has identified a modified Alternative D as its Preferred Alternative. Although the Preferred Alternative is substantially the same as Alternative D in the draft Supplemental IAP/EIS, it includes language that clarifies some stipulations and Required Operating Procedures (ROPs), in response to public comments. It also extends the Southern Caribou Calving Area near Teshekpuk Lake by about 7,000 acres and makes Teshekpuk Lake and its islands unavailable for leasing. Finally, the Preferred Alternative defers any oil and gas leasing in the portion of the planning area in which leasing was not allowed in the 1998 ROD for ten years from the signing of the ROD for this action.

In its November 2, 2007, letter, EPA rated the draft Supplemental IAP/EIS and Alternative D as EO-2 (Environmental Objections-Insufficient Information) primarily due to potential adverse impacts to wetlands, aquatic habitat and fish and wildlife. We suggested that BLM consider a modified alternative that would reduce the potential impacts, especially to water quality, by retaining the current leasing acreage and surface activity restrictions.

EPA acknowledges the challenges BLM encountered in developing the Supplemental IAP/EIS for the NE NPR-A, and attempting to strike a balance between protecting the valuable resources of the NE NPR-A while addressing the Nation's need for the production of more oil and gas. We also recognize the extraordinary efforts BLM has undertaken to revise the IAP/EIS in response to public comments and commend BLM for a very thorough and organized "*Comments and Responses*" section (Chapter IV).

We believe that with the modifications to Alternative D, including the revisions and clarifications to many of the stipulations and ROPs, the restrictions on leasing in Teshekpuk Lake and its islands, and the 10-year deferral, many of the substantial concerns we had with the draft IAP/EIS have been addressed. More specifically, we are particularly pleased with the 7,000-acre expansion of the Southern Caribou Calving Area; the unavailability of the Lake and its islands to leasing; as well as the deferral of any oil and gas leasing in the northern and eastern sections of the planning area where leasing was not allowed under the 1998 ROD. This approach will help to ensure that these areas of great importance for waterfowl (especially during the flightless molting period), caribou (for calving and insect relief), and subsistence users will remain protected for the near future. Therefore EPA does not object to the preferred alternative and we encourage the BLM to adopt Alternative D as described in the final IAP/EIS in the ROD.

EPA appreciates the opportunity to provide comments on the NE NPR-A Final Supplemental IAP/EIS. If you have questions or concerns regarding these comments, please contact Jennifer Curtis of my staff at (907) 271-6324 or via email at curtis.jennifer@epa.gov.

Sincerely,

/s/

Christine Reichgott, Manager
NEPA Review Unit

cc: Jim Ducker, Environmental Program Analyst, Alaska State Office, BLM